

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

:  
Chapter 11

:  
SAINT VINCENTS CATHOLIC MEDICAL  
CENTERS OF NEW YORK, d/b/a SAINT :  
VINCENT'S CATHOLIC MEDICAL  
CENTERS, et. al. :

Case No. 10-11963 (CGM)

Judge Cecelia G. Morris

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**DECLARATION OF DAVID J. PIERGUIDI, ESQ.**

David J. Pierguidi, deposes and says under penalty of perjury as follows:

1. I am an associated at The Pagan Law Firm, P.C., counsel the plaintiff, JORGE RUIZ, entitled Ruiz vs. Selby, et al., pending in New York State Supreme Court, New York County (the "New York State Court") under Index No 102075/08 (the "State Court Action").

2. I am unable to file this instant Motion pursuant to 11 U.S.C. § 362(d)(1) and Bankruptcy Rule 4001(a) electronically on the New York Southern District Bankruptcy Electronic Case files because I do not have a login and password for the above captioned bankruptcy matter.

3. It is respectfully requested that the Clerk of the Court accept filing of this Motion by paper submission.

Dated: New York, New York  
May 12, 2010

/s/ David J. Pierguidi  
David J. Pierguidi, Esq.

S.D. OF N.Y.  
2010 MAY 12 A 10:41  
FILED  
U.S. BANKRUPTCY COURT